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Scott B. Piekarsky, Esq. (SP1460)
PIEKARSKY & ASSOCIATES, L.L.C.
191 Godwin Avenue
Wyckoff, New Jersey 07481
Tel: (201) 560-5000
Fax: (201) 560-1440
Attorneys for Plaintiff:
ANGEL SANTIAGO

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

-----	:	COMPLAINT
ANGEL SANTIAGO,	:	
	:	Docket No.:
	:	
Plaintiff,	:	
	:	PLAINTIFF DEMANDS A TRIAL
v.	:	BY JURY
	:	
ID&T, ID&T North America and Bethel	:	
Woods Center for the Arts	:	
Defendants.	:	
-----	:	

Plaintiff, Angel Santiago by his attorneys, Piekarsky & Associates, LLC. respectfully alleges as follows:

NATURE OF THE CASE

1. This is a civil action for personal injury suffered by Plaintiff, Angel Santiago against Defendant ID&T, ID&T North America and Bethel Woods Center for the Arts. This action arises out of a slip and fall accident on May 24, 2015 on the property of Defendant Bethel Woods on which Defendant ID&T was operating the Mysteryland Music Festival at which time due to the negligence of Defendants', Plaintiff was caused to slip and fall and sustain severe and permanent personal injuries. The Defendants' negligence was a substantial contributing factor in causing Plaintiffs' injuries.

PARTIES

2. Plaintiff, Angel Santiago is an individual and citizen of the State of New Jersey.
3. Defendant ID&T and ID&T North America are foreign entities that promote music and dance music events worldwide.
4. Bethel Woods Center for the Arts is a non-profit entity that owns and rents out the former Woodstock property. In the instant case, they leased or licensed their property to the ID&T entities for The Mysteryland Music Festival.
5. This Court has original jurisdiction over this action under 28 U.S.C. Section 1332, in that the amount of controversy exceeds seventy five thousand dollars (\$75,000) and Plaintiff is a citizen of a state which is different from the states where Defendants are incorporated and have their principal places of business.
6. Venue is proper in this district, because the Plaintiff lives and resides in Elizabeth in the County of Union, which falls within the jurisdiction of this Court.

THE INCIDENT

7. Plaintiff, Angel Santiago learned of the subject music event through advertising directed and targeted at New Jersey residents and purchased a ticket in advance of the event.
8. The music event occurred at the Bethel Woods site in Bethel, New York on May 24, 2015.
9. Plaintiff attended the event run by the ID&T entities.
10. At the end of the event, Plaintiff and scores of other attendees had to walk back to their cars over wet, tall grass fields that were extremely dark. Upon traversing a decline in the dark in the long wet grass, Plaintiff, like many others that day, was caused to slip and fall on his left ankle causing dislocation and tendon tears requiring multiple subsequent surgeries and a permanent medical condition and disability.

(FIRST COUNT) **NEGLIGENCE**

11. Plaintiff incorporates by reference all of the preceding paragraphs of this Complaint as if fully set forth herein.
12. On or about May 24, 2015, Plaintiff Angel Santiago was a business invitee of Defendants upon land either owned, maintained, leased and/or controlled by Defendants.

13. Defendants were careless and negligent in the ownership, maintenance and operation of the subject property, which caused Mr. Santiago to suffer severe personal injuries.
14. As a direct and proximate result of said incident, Mr. Santiago was caused to sustain severe and painful bodily injuries which required multiple surgeries, extensive medical treatment, and will require significant physical rehabilitation.
15. As a direct and proximate result of the permanent physical injuries sustained by Mr. Santiago in the incident, he has been incapacitated from pursuing his usual employment and other activities, will be left with disabilities that will in the future similarly incapacitate him and caused him pain and suffering, and will require medical treatment.

DEMAND FOR JURY TRIAL

Plaintiff here demands a jury trial as to all issues so triable as a matter of right, pursuant to F.R.C.P. 38(b)(1) and 38 (c).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands upon Defendants:

- a. actual, compensatory and statutory damages;
- b. pre and post-judgement interest as allowed by law;
- c. an award of attorneys' fees and allowed by law;
- d. an award of taxable costs; and
- e. any and all such further relief as this Court deems just and proper.

Piekarsky & Associates, LLC.

BY: _____

SCOTT B. PIEKARSKY, ESQ.

DATED: SEPTEMBER 28, 2015